

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

| | | |
|------------------------|---|---------------------------|
| UNITED STATES, et al., |) | |
| |) | |
| v. |) | No. 1:23-cv-00108-LMB-JFA |
| |) | |
| GOOGLE LLC, |) | |
| |) | |
| Defendant. |) | |

JOINT STATUS REPORT

Pursuant to the Court’s April 11, 2023 Order, at ECF No.102, the parties hereby notify the Court of the current status of the submission of the protocol for the production of electronically stored information (“ESI”) and documents and the proposed stipulation and order concerning expert witnesses.

1. On April 12, 2023, the parties submitted a joint motion for entry of a proposed stipulation and order concerning expert witnesses. *See* ECF No. 103.

2. The parties have agreed to use the ESI order entered in the MDL as the basis for negotiating a protocol for the production of ESI in this case.

3. The parties remain optimistic that they will be able to reach agreement on substantial portions of the ESI protocol.

4. The parties will make their best good-faith efforts to submit a proposed ESI protocol to the Court, indicating any remaining areas of disagreement, by 4:00 pm ET on April 19, 2023.

5. To the extent that the parties have not reached agreement on the substance of an ESI submission to the Court by 4:00 pm ET on April 19, 2023, the parties will instead submit a joint status report to the Court by that date and time setting forth the current status of negotiations on the ESI protocol.

Dated: April 12, 2023

Respectfully submitted,

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